

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:14-00114

RONALD BARNETTE

RESPONSE TO DEFENDANT'S RENEWED MOTION TO TERMINATE PROBATION

Comes now the United States of America, by Meredith George Thomas, Assistant United States Attorney for the Southern District of West Virginia, and files this response to defendant's Renewed Motion to Terminate Probation.

In late February 2015, defendant was sentenced to a three-year term of probation.

After serving a little over half of his probationary term, defendant filed a motion seeking early termination of probation. In support of his motion for early termination, defendant argues that an end to his term of probation will assist him in traveling freely for his business. Defendant has now renewed that motion, noting that he has frequent travel for business and pleasure.

Defendant has failed to allege any circumstances that would warrant early termination. While defendant's compliance with the

conditions of probation reflects well upon him, his performance does not justify eliminating the remainder of his sentence.

There is nothing particularly onerous about the term or conditions of defendant's probation. Defendant admits that he has had no issues in complying with his conditions of probation.

The United States is satisfied that the factual details of this case have been thoroughly developed in this record and in the pre-sentence report and that its arguments in support of sentencing are, likewise, a matter of record.

The Court has jurisdiction and discretion to alter or remove the term of probation imposed herein. The United States does not object to the Court exercising that authority and discretion without further argument or evidence.

Respectfully submitted,

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By:

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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing "RESPONSE TO DEFENDANT'S RENEWED MOTION TO TERMINATE PROBATION" has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing this 8th day of December, 2017, to:

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